



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/AFM/KCB
F. #2018R01047

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 2, 2020

By Email and ECF

James M. Branden
Albert Y. Dayan
Kenneth J. Kaplan
Joel M. Stein
Geoffrey R. Kaiser
Todd D. Greenberg
John S. Wallenstein
Richard D. Willstatter

Re: United States v. Jack Cabasso, et al.
Criminal Docket No. 19-CR-582 (DRH)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This supplements the disclosures of Rule 16 discovery produced to individual defendants on January 14, 2020, and to all defendants on June 24, 2020. The government renews its request for reciprocal discovery from the defendants.

Specifically, enclosed please find the following materials, which are subject to the protective order entered in this case on May 29, 2020:

Records	Bates Number
Email data from Microsoft Corporation, obtained pursuant to the judicially-authorized search warrant produced to you at AVENTURA_0000080277 to AVENTURA_0000080287	AVTESI_0000000001-AVTESI_0000934983

Email data from Rackspace US, Inc., obtained pursuant to the judicially-authorized search warrant produced to you at AVENTURA_0000080271 to AVENTURA_0000080276	AVTESI_0000934984- AVTESI_0000939874
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The email data consists of load files containing native, text and TIFF files. The government expects to make the same emails available as an alternate dataset in Ipro Eclipse format.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
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Enclosures

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)